

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FULL CIRCLE UNITED, LLC,

Plaintiff,

v.

BAY TEK ENTERTAINMENT, INC.,

Defendant.

CASE NO. 1:20-CV-03395-BMC

ORAL ARGUMENT REQUESTED

BAY TEK ENTERTAINMENT, INC.,

Counterclaim Plaintiff,

v.

FULL CIRCLE UNITED, LLC,

Counterclaim Defendant,

and

ERIC PAVONY,

Additional Counterclaim
Defendant.

**NOTICE OF MOTION *IN LIMINE* TO EXCLUDE
THE REPORTS AND TESTIMONY OF LAURA SMITH**

PLEASE TAKE NOTICE that pursuant to Rules 403, 702, and 703 of the Federal Rules of Evidence and upon the accompanying Memorandum of Law and the Declaration of Mark C. Humphrey dated January 15, 2025 and exhibits appended thereto, and all prior pleadings and proceedings herein, Defendant and Counterclaim Plaintiff Bay Tek Entertainment, Inc. hereby moves this Court to exclude from trial the opinions, reports, and testimony of Laura Smith,

offered by Plaintiff and Counterclaim Defendant Full Circle United, LLC as an expert witness on damages and for such other further relief as the Court may deem just and proper.

DATED: New York, New York
January 15, 2025

Respectfully submitted,
Mitchell Silberberg & Knupp LLP

By: /s/ Mark C. Humphrey
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